

Camp Keating POL Discharge Contingency Plan

Response Activities

In the event of a discharge (spill), the first priority is to stop the product flow and to shut off all ignition sources, followed by the containment, control, and mitigation of the discharge. This Sample Contingency Plan breaks actions to be performed to respond to a POL discharge. Other contaminant spills would have similar containment contingency plans. 40 *CFR* 109.5(d) 40 *CFR* 109.5(e)

Discharge Discovery and Source Control

Minor Discharge. A minor discharge (i.e., small volume leak from flowlines or other equipment) will be discovered by facility personnel or by contractor personnel during scheduled daily or monthly inspections of the facility.

Major Discharge. A more severe and sudden discharge will trigger the automatic shut down of the pumping units. The impact will be detected during the daily visit to the production area by military or contractor field personnel.

Notifications to the National Response Center, Arkansas authorities and Keating Emergency Committee must occur immediately upon discovery of reportable discharges.

| Completed Actions |
|---|
| Immediately report the discharge to the Response Coordinator (RC), providing the following information: <ul style="list-style-type: none">• Exact location;• Material involved;• Quantity involved;• Topographic and environmental conditions;• Circumstances that may hinder response; and• Injuries, if any. |
| Turn off all sources of ignition. |
| Turn off supply pumps that charge or provide flow to the flowline. |
| Locate the flowline break. |
| If safe to do so, isolate the affected section of piping by closing off the closest valves upstream and downstream from the break. |

Assessment and Notifications

| Completed Actions |
|---|
| Investigate the discharge to assess the actual or potential threat to human health or the environment: <ul style="list-style-type: none">• Location of the discharge relative to receiving waterbodies;• Quantity of spilled material;• Ambient conditions (temperature, rain);• Other contributing factors such as fire or explosion hazards; and• Sensitive receptors downstream. |
| Request outside assistance from local emergency responders, as needed. |
| Evaluate the need to evacuate facility and evacuate employees, as needed. |
| Notify the fire/police departments and Keating City Emergency Committee to assess whether community evacuation is needed. |
| Notify immediately: <ul style="list-style-type: none">• 911• National Response Center• Response contractor(s)• Keating City Emergency Planning Committee• State authorities |
| Communicate with neighboring property owners regarding the discharge and actions taken to mitigate the damage. |
| If the oil reaches (or threatens to reach) the Arkansas River, notify the local fire/police departments to limit access to the River by local residents until the oil has been contained and recovered. Additionally, notify downstream water users of the spill and of actions that will be taken to protect these downstream receptors. |

Control and Recovery

The RC directs the initial control of the oil flow by Camp Keating personnel and other contractor personnel. The actions taken will depend on whether the oil has reached water or is still on land. All effort will be made to prevent oil from reaching water.

If the oil has not yet reached water:

| Completed Actions |
|---|
| Deploy sand bags and absorbent socks down gradient from the oil, or erect temporary barriers such as trenches or mounds to prevent the oil from flowing towards the Arkansas River. |
| Implement land based response actions (countermeasure) such as digging temporary containment pits, ponds, or curbs to prevent the flow of oil into the river. |
| Deploy absorbent sock and absorbent material along the shoreline to prevent oil from entering waters. |

If the oil has reached water:

| Completed Actions |
|--|
| Contact cleanup contractor(s). |
| Deploy floating booms immediately downstream from the release point. The Arkansas River is a major waterway and requires the use of barges for floating boom deployment. |
| Control oil flow on the ground by placing absorbent socks and other sorbent material or physical barriers (e.g., “kitty litter,” sandbags, earthen berm, trenches) across the oil flow path. |
| Deploy additional floating booms across the whole width of the river at the next access point downstream from the release point. |
| Deploy protective booming measures for downstream receptors that may be impacted by the spill. |

Disposal of Recovered Product and Contaminated Response Material

The RC ensures that all contaminated materials classified as hazardous waste are disposed of in accordance with all applicable solid and hazardous waste regulations.

| Completed Actions |
|--|
| Place any recovered product that can be recycled into the gun barrel tank to be separated and recycled. |
| Dispose of recovered product not suitable for on-site recycling with the rest of the waste collected during the response efforts. |
| Collect all debris in properly labeled waste containers (impervious bags, drums, or buckets). |
| Dispose of contaminated material in accordance with all applicable solid and hazardous waste regulations using a licensed waste hauler and disposal facility, after appropriately characterizing the material for collection and disposal. |
| Dispose of all contaminated response material within 2 weeks of the discharge. |

Termination

The RC ensures that cleanup has been completed and that the contaminated area has been treated or mitigated according to the applicable regulations and state/federal cleanup action levels. The RC collaborates with the local, state and federal authorities regarding the assessment of damages.

| Completed Actions |
|--|
| Ensure that all repairs to the defective equipment or flowline section have been completed. |
| Review circumstances that led to the discharge and take all necessary precautions to prevent a recurrence. |
| Evaluate the effectiveness of the response activities and make adjustments as necessary to response procedures and personnel training. |
| Carry out personnel and contractor debriefings as necessary to emphasize prevention measures or to communicate changes in operations or response procedures. |
| Submit any required follow-up reports to the authorities. In the case where the discharge (as defined in 40 CFR 112.1(b)) was greater than 1,000 gallons or was the second discharge (as defined in 40 CFR 112.1(b)) of 42 gallons or more within any 12-month period, the RC is responsible for submitting the required information within 60 days to the EPA Regional Administrator following the procedures outlined in Appendix B. Within 30 days of the discharge, the RC will convene an incident critique including all appropriate persons that responded to the spill. The goal of the incident critique is to discuss lessons learned, the efficacy of the Contingency Plan and its implementation, and coordination of the plan/RC and other state and local plans. Within 60 days of the critique, the Contingency Plan will be updated (as needed) to incorporate the results, findings, and suggestions developed during the critique. 40 CFR 112.4(a) |

Discharge Notification

Instructions and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local authorities are provided in Appendix B to this Plan. Any discharge to water must be reported immediately to the National Response Center. The Response Coordinator must ensure that details of the discharge are recorded on the Discharge Notification Form provided in Appendix B.

If the discharge qualifies under 40 CFR part 112 (see Appendix B for conditions), the RC is responsible for ensuring that all pertinent information is provided to the EPA Regional Administrator.